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Attorneys for Debtor and Reorganized Debtor

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

| | | |
|-------------------------------|---|--------------------------------|
| ----- | X | |
| | : | |
| In re | : | Chapter 11 |
| | : | |
| CHINOS HOLDINGS, INC., | : | Case No. 20–32181 (KLP) |
| | : | |
| Debtor.¹ | : | |
| | : | |
| ----- | X | |

**PROPOSED AGENDA FOR HEARING
ON SEPTEMBER 16, 2021, AT 11:00 A.M. (PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE that the following matters are scheduled for a hearing on September 16, 2021, at 11:00 A.M. (prevailing Eastern Time):

I. ADJOURNED MATTERS

1. **“Thirteenth Omnibus Objection”** – *Debtors’ Thirteenth Omnibus Objection to Claims (Satisfied Claims and Reduced and/or Reclassified Claims)* [ECF No. 1268]

Related Documents:

¹ On August 26, 2020, the Court confirmed the *Second Amended Joint Prearranged Chapter 11 Plan of Reorganization of Chinos Holdings, Inc. and Its Affiliated Debtors (with Technical Changes)* (Docket No. 861), which went effective on September 10, 2020.

The Reorganized Debtor, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is Chinos Holdings, Inc. (3834). The Reorganized Debtor’s corporate headquarters and service address is 225 Liberty St., New York, NY 10281.

- (a) *Notice of Hearing on Debtors' Thirteenth Omnibus Objection to Claims (Satisfied Claims and Reduced and/or Reclassified Claims)* [ECF No. 1268]
- (b) *Order Granting Debtors' Thirteenth Omnibus Objection to Claims (Satisfied Claims and Reduced and/or Reclassified Claims)* [ECF No. 1296]

Response Deadline: June 8, 2021.

Responses:

- (c) *United States' Response in Opposition to Debtors' Thirteenth Omnibus Objection to Claims (Satisfied Claims and Reduced and/or Reclassified Claims)* [ECF No. 1282] (the **"U.S. Customs and Border Protection Response"**)

Status: The Reorganized Debtor is working to consensually resolve the U.S. Customs and Border Protection Response. To the extent not resolved sooner, the Reorganized Debtor will adjourn the hearing on this matter to the Omnibus Hearing scheduled for October 20, 2021, at 11:00 a.m. (prevailing Eastern Time) solely with respect to the relief sought in connection with the claim related to U.S. Customs and Border Protection Response.

The Court already has entered the order approving the Thirteenth Omnibus Objection as to all other claims included therein.

II. UNCONTESTED MATTERS

- 2. **"GUC Trust's Eighth Omnibus Objection"** – *GUC Trust's Eighth Omnibus Objection to Certain Claims (Cured, No Liability and Reduced Claims)* [ECF No. 1319]

Related Documents:

- (a) *Notice of Hearing on GUC Trust's Eighth Omnibus Objection to Certain Claims (Cured, No Liability and Reduced Claims)* [ECF No. 1319]

Response Deadline: August 24, 2021.

Responses: None.

Status: The GUC Trust has submitted a proposed order approving the GUC Trust's Eighth Omnibus Objection.

- 3. **"Motion to Approve"** – *Motion of the Reorganized Debtor to Approve Stipulated Order Regarding Claim No. 323 of the U.S. Customs and Border Protection* [ECF No. 1327]

Related Documents:

(a) *Notice of Motion and Notice of Hearing* [ECF No. 1327]

(b) *Certificate of No Objection* [ECF No. 1331]

Response Deadline: September 9, 2021.

Responses: None

Status: The Reorganized Debtor has submitted a proposed order approving the Motion to Approve.

Dated: September 14, 2021
Richmond, Virginia

/s/ Henry P. (Toby) Long, III
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